MTSA/ISPS POLICY ADVISORY COUNCIL
March 15, 2005

Policy
Personnel Conducting Security Audits
52-05 Change 1

FINAL

Issue **(52-05 Ch 1):** Who may conduct Vessel and Facility Security audits?

Policy:

This policy is intended to support audit procedures documented in a Vessel or Facility Security Plan. If policy contained within this paper opposes approved procedures included in a Coast Guard approved security plan, a vessel or facility is to follow the policy located in such a plan, and make a formal amendment to the plan if necessary. Amendment procedures are located in 33 CFR 104.415(a) and 33 CFR 105.415(a).

33 CFR 104.415(b) and 105.415(b) lists the requirements for personnel conducting internal audits of security measures; unless it is determined that such provisions are impracticable due to the size and nature of the company or the vessel.

In all cases, utilizing a VSO or FSO from one company owned/operated vessel or facility to audit the VSP or FSP at another of the company's vessels or facilities, **where they do not have security responsibilities for that vessel or facility**, is acceptable. Such arrangements may also be desirable as they contribute to positive benchmarking and the identification and adoption of best practices within the company, by the auditors.

It should also be noted that the ISPS Code prohibits a RSO, that is involved in developing a VSP, from reviewing or approving, on behalf of an Administration, that same VSP.

Consequently, the regulations do not prohibit any third party, including entities that have RSO status abroad, from performing an assessment or audit of a VSP or FSP; as long as they are not responsible for implementing any of the security measures for that individual vessel or facility.

One checklist that may be used by people completing the audits of Vessel Security Plans is the Domestic Vessel Security Plan Verification Guide for MTSA/ISPS Code, located in Navigation and Inspection Circular 04-03 Change 1, Enclosure 7. http://www.uscg.mil/hq/g-m/mp/pdf/NVIC_0403.pdf
Facility security auditors may follow the MTSA Facility Compliance Guide, located in Navigation and Inspection Circular 03-03 Change 1, Enclosure 10. http://www.uscg.mil/hq/g-m/mp/pdf/NVIC_0303.pdf